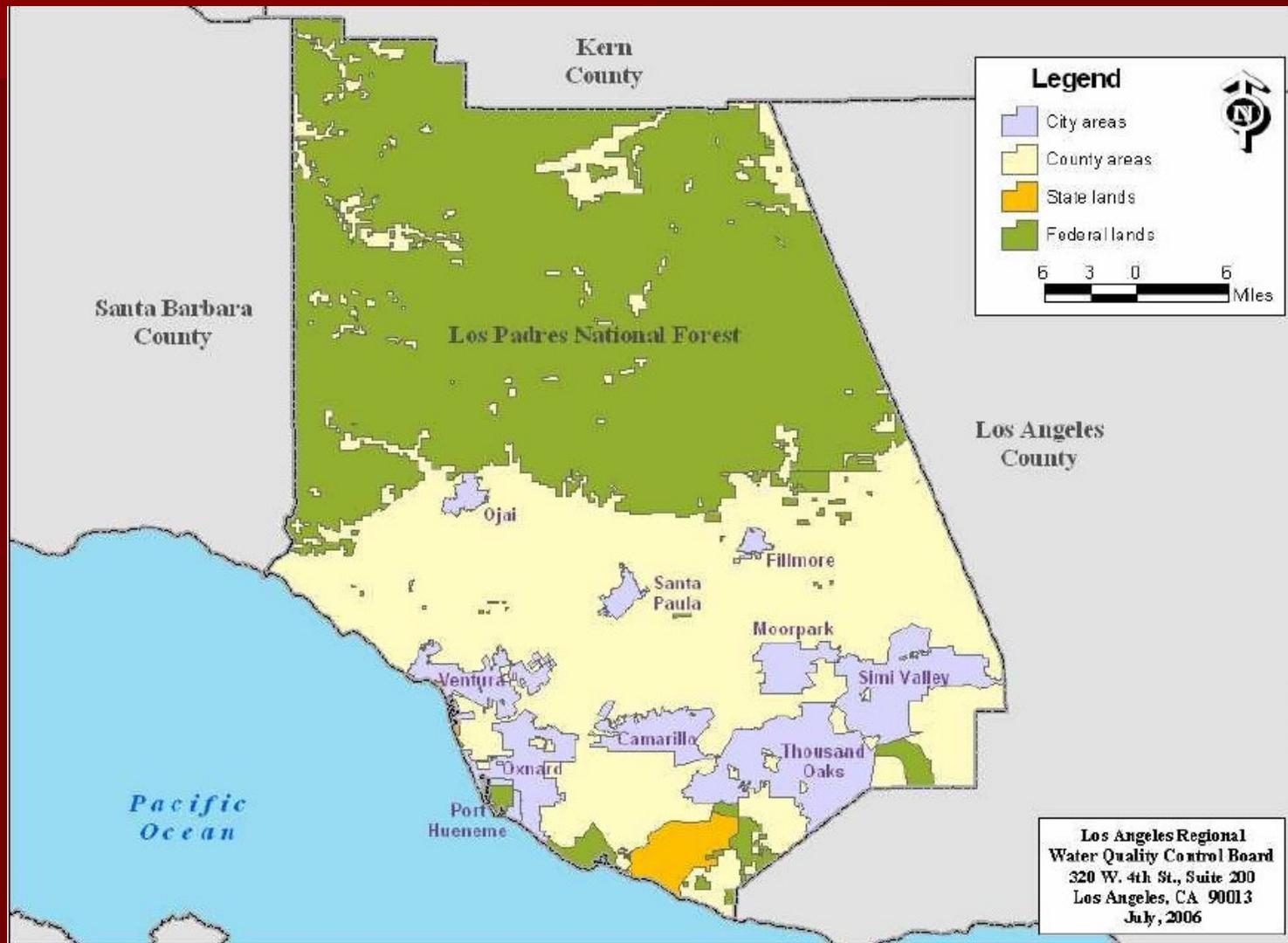


Jurisdictional Concerns

Figure 1- Proposed Area of Permit Coverage



Proposed Area of Coverage Based on Both Fact *and* Fiction?

True ... **The Clean Water Act requires *MS4s* to be covered under an NPDES permit (MS4 Permit)**

True ... **MS4 Permits target runoff from *urban development* for water quality controls**

True ... **Ventura County has areas of *urban development***

False ... **Ventura County is mostly *urban development* or area *undergoing urban development***

Unincorporated Ventura County =

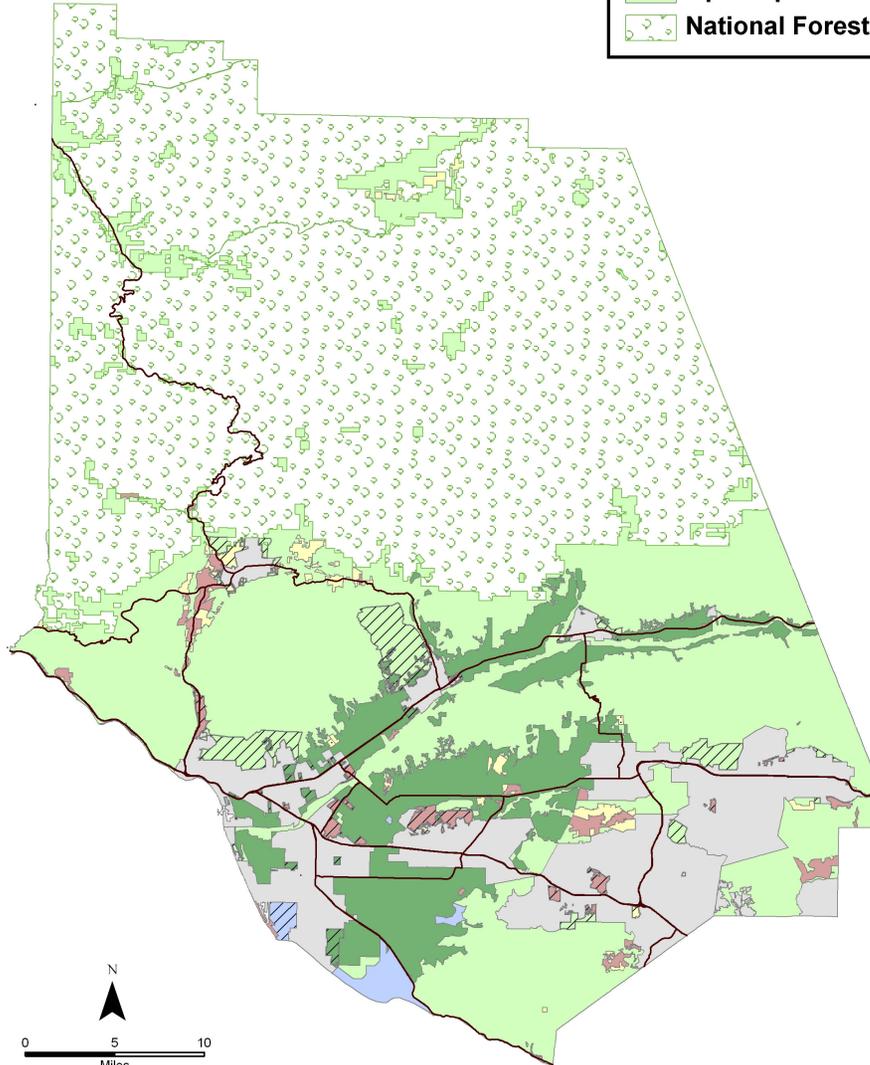


- Urban development is *strictly limited* to cities and their “spheres of influence”
- Unincorporated areas are primarily:
 - National Forest
 - Agricultural
 - Open Space

Unincorporated Ventura County's "open space"



Ventura County General Plan



Green areas limited to:

- Agricultural areas
- National Forest
- *Open Space*



In Summary

- MS4 Permits target runoff from *urban development*
- Unincorporated Ventura County is primarily composed of Open Space, Agricultural area, or National Forest - *not urban development*
- We urge your Regional Board to direct staff to correct an apparent *error* in the draft permit -
Please revise Figure 1 to remove all non-urbanized areas of unincorporated Ventura County from coverage under this urban stormwater permit!